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11 Charles Hogarty

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 CHARLES HOGARTY,

15 Plaintiff,

16 v.

17 NEC CORPORATION OF AMERICA, et al.,

18 Defendants.
19

CASE NO. 08-CV-677 DMS BLM

JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT INNOVATIVE
EMPLOYEE SOLUTIONS, INC. TO
RESPOND TO THE COMPLAINT

Hon. Dana M. Sabraw

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21 PLEASE TAKE NOTICE that Defendant Innovative Employee Solutions, Inc. ("Defendant")
22 and Plaintiff Charles Hogarty ("Plaintiff") hereby jointly move the Court for an order allowing
23 Defendant an extension of time in which to file a responsive pleading to Plaintiff's Complaint until
24 May 30, 2008. Pursuant to Rule 6 of the Civil Pretrial & Trial Procedures of Judge Dana M. Sabraw,
25 counsel for Defendant and Plaintiff have conferred regarding a potential Rule 12(b) motion that may
26 be filed by one or more defendants regarding transfer of venue. Discussions regarding this potential
27 motion are ongoing and may resolve the issues surrounding venue.

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1 Accordingly, the instant request for an extension of time is supported by good cause, and the
2 parties believe that it is in the interest of judicial economy to grant the extension of time.

3 Dated: April 30, 2008

BLACKMAR, PRINCIPE & SCHMELTER,
A Professional Corporation

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5 By: s/Peter J. Attarian, Jr.
6 Attorneys for Defendant
7 Innovative Employee Solutions, Inc.
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8 Dated: April 30, 2008

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